

1           FILED       ENTERED  
2           LODGED       RECEIVED  
3

Magistrate Judge Mary Alice Theiler

4           FEB 26 2020  
5

6  
7           AT SEATTLE  
8           CLERK U.S. DISTRICT COURT  
9           WESTERN DISTRICT OF WASHINGTON  
10          BY           DEPUTY  
11

12           UNITED STATES DISTRICT COURT FOR THE  
13           WESTERN DISTRICT OF WASHINGTON  
14           AT SEATTLE  
15

16           UNITED STATES OF AMERICA,  
17           Plaintiff,  
18           v.  
19           Cameron Shea,  
20           Defendant.

NO. MJ20-D88

MOTION FOR DETENTION

21           The United States moves for pretrial detention of the Defendant, pursuant  
22 to 18 U.S.C. 3142(e) and (f)

23           1. **Eligibility of Case.** This case is eligible for a detention order because this  
24 case involves (check all that apply):

- 25            Crime of violence (18 U.S.C. 3156).  
26            Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence  
27 of ten years or more.  
28            Crime with a maximum sentence of life imprisonment or death.  
29            Drug offense with a maximum sentence of ten years or more.

1       Felony offense and defendant has two prior convictions in the four  
2 categories above, or two State convictions that would otherwise fall within these four  
3 categories if federal jurisdiction had existed.

4       Felony offense involving a minor victim other than a crime of violence.  
5       Felony offense, other than a crime of violence, involving possession or use  
6 of a firearm, destructive device (as those terms are defined in 18 U.S.C. 921), or any  
7 other dangerous weapon.

8       Felony offense other than a crime of violence that involves a failure to  
9 register as a Sex Offender (18 U.S.C. 2250).

10      Serious risk the defendant will flee.  
11      Serious risk of obstruction of justice, including intimidation of a  
12 prospective witness or juror.

13     2. **Reason for Detention.** The Court should detain defendant because there  
14 are no conditions of release which will reasonably assure (check one or both):

15      Defendant's appearance as required.  
16      Safety of any other person and the community.

17     3. **Rebuttable Presumption.** The United States will invoke the rebuttable  
18 presumption against defendant under 3142(e). The presumption applies because:

19      Probable cause to believe defendant committed offense within five years of  
20 release following conviction for a qualifying offense committed while on pretrial release.  
21      Probable cause to believe defendant committed drug offense with a  
22 maximum sentence of ten years or more.

23      Probable cause to believe defendant committed a violation of one of the  
24 following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or kidnap), 2332b (act  
25 of terrorism), 2332b(g)(5)(B) (crime of terrorism).

Probable cause to believe defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing:

- At the initial appearance  
 After a continuance of 2 days (not more than 2)

DATED this 26th day of February 2020..

Respectfully submitted,

BRIAN T. MORAN  
United States Attorney

**THOMAS M. WOODS**  
Assistant United States Attorney